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THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

BRAD SMITH, an individual,

Plaintiff,

v.

BIONA US, LLC, a Washington Limited Liability Company,

Defendant.

CASE NO. 2:18-cv-01606-JLR

STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR COMBINED JOINT STATUS REPORT AND DISCOVERY PLAN

STIPULATION

Plaintiff Brad Smith and Defendant Biona US, LLC, through their respective attorneys of record, hereby make the following representations, stipulations and agreements:

The parties jointly request that the scheduling deadline for the Combined Joint Status Report and Discovery Plan shall be extended from 1/7/2019 to the later date of 2/11/2019 to allow time for potential early resolution negotiations.

DATED this 19th day of December, 2018.

STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR COMBINED JOINT STATUS REPORT AND DISCOVERY PLAN –1 Case No.: 2:18-cv-01606-JLR

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1 Attorneys for Plaintiff Attorneys for Defendant 2 3 By: s/Gretchen Graham Salazar By: s/C. Ryan Morgan Gretchen Graham Salazar, C. Ryan Morgan, 4 WSBA #26186 FSBA #0015527 5 By: s/ Kasey D. Huebner By: s/Spencer Nathan Thal Spencer Nathan Thal, Kasey D. Huebner, 6 WSBA #20074 WSBA #32890 7 8 PROPOSED ORDER 9 10 The Court, having reviewed the records and files herein, and the foregoing stipulation, and 11 deeming itself fully informed, hereby ORDERS, ADJUDGES and DECREES that: 12 This Court has jurisdiction to issue an order in this matter; 1.1 13 This Court hereby extends the scheduling deadline for the Combined Joint Status 1.2 14 Report and Discovery Plan from 1/7/2019 to the later date of 2/11/2019. 15 16 DATED this 20 day of December, 2018. 17 18 James L. Robart 19 United States District Judge Presented by: 20 Attorneys for Defendant 21 Attorneys for Plaintiff 22 By: s/Gretchen Graham Salazar By: s/C. Ryan Morgan Gretchen Graham Salazar, C. Ryan Morgan, 23 WSBA #26186 FSBA #0015527 (Appearing *pro hac vice*) 24 By: s/Kasey D. Huebner Kasey D. Huebner, 25 By: s/Spencer Nathan Thal Spencer Nathan Thal, WSBA #32890 26 WSBA #20074

STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR COMBINED JOINT STATUS REPORT AND DISCOVERY PLAN –2 Case No.: 2:18-cv-01606-JLR

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